

BEFORE THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

DOCKET NO. 2014-54-E

In re: Petition of South Carolina)	
Electric & Gas Company for Approval)	PETITION TO INTERVENE
To Participate in a Distributed)	OF THE ELECTRIC COOPERATIVES
Energy Resource Program)	OF SOUTH CAROLINA, INC. AND
)	CENTRAL ELECTRIC POWER
)	COOPERATIVE, INC.
)	
)	
)	

Pursuant to Public Service Commission Regulation 103-825, and other applicable provisions of the Commission's Rules of Practice and Procedure, Central Electric Power Cooperative, Inc. ("Central") and The Electric Cooperatives of South Carolina, Inc. ("ECSC") (jointly referred to as the "Petitioners") hereby file this Petition to Intervene in the above-captioned proceeding. In support of this Petition, Central and ECSC state as follows:

- 1) Central is a generation and transmission electric cooperative formed under SC Code Section 33-49-10, *et. seq.* Central's principal place of business is 121 Greystone Boulevard, Columbia, South Carolina 29202. Central's mailing address is P.O. Box 1455, Columbia, South Carolina 29202. Central is engaged in the purchase, transmission and sale of electric power to twenty (20) distribution electric cooperatives throughout the state of South Carolina. Central's distribution cooperative members provide electric power to over 700,000 homes, businesses, and industrial members throughout all 46 South Carolina counties and a small portion of North Carolina.
- 2) ECSC consists of member electric cooperatives organized in the State of South Carolina. ECSC serves as a legal and regulatory representative of its member electric cooperatives.

ECSC is the state-wide service and trade association for electric cooperatives in the state. ECSC's members are twenty consumer-owned electric cooperatives, one wholesale power supply cooperative (Central) and one materials supply cooperative. Together, ECSC's members operate the largest electric distribution system in the state. More than 1.5 million South Carolinians in all 46 counties use electricity from electric cooperatives. ECSC's principal place of business and mailing address is 808 Knox Abbot Drive, Cayce, South Carolina 29033.

3) Pursuant to Rule R. 103-804(S) of the Commission's Rules of Practice and Procedure, Petitioners are represented by counsel in this proceeding:

John H. Tiencken, Jr.
Paul J. Conway
Tiencken Law Firm, LLC
234 Seven Farms Drive, Ste. 114
Charleston, South Carolina 29492
Telephone: 843.377.8415
Fax: 843.377.8419

Charles L.A. Terreni
Terreni Law Firm, LLC
1508 Lady Street.
Columbia, South Carolina 29201
Telephone: 803.771 7228
Fax: 803 771-8778

Michael N. Couick
Christopher R. Koon
The Electric Cooperatives
of South Carolina, Inc.
808 Knox Abbott Drive
Cayce, South Carolina
Telephone: (803) 739.3034
Fax: (803) 796.6064

4) On June 5, 2014, the Commission opened a generic proceeding on the petition of the Office of Regulatory Staff filed pursuant to Section 58-40-20(F)(4) of the Distributed Energy Resource Program Act ("the Act"), which charges the Commission with conducting a generic proceeding "for the purposes of implementing the requirements of Chapter 40, with respect to the net energy metering rates, tariffs, charges and credits of electrical utilities, and specifically to establish the methodology to set any necessary charges and credits". Docket No. 2014-246-E. The Act required the electric cooperatives to "consider the general objectives of

[the Act] and any methodology promulgated thereunder” in formulating their net metering policies. See Section 7 of the Act. The ECSC and Central were granted intervention in the generic proceeding, and the matter was concluded with a settlement approved by the Commission on March 20, 2015. *See* Order 2015-194. The ECSC and Central were parties to the settlement, which established, among other things, a methodology for the establishment of net metering charges and credits, and said methodology will be applied in this proceeding.

5) In the instant docket, South Carolina Electric & Gas Co. (SCE&G) has filed an application for approval of a Distributed Energy Resource Program (DER) pursuant to S.C. Code Section 58-39-110 *et seq.* SCE&G proposes the development and installation of various solar photovoltaic facilities as part of its DER program including utility scale facilities and customer scale facilities, community solar facilities, solar leasing arrangements, and net metering incentives.

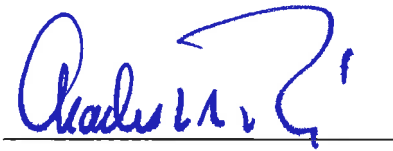
6) The Cooperatives have an interest in this proceeding because the Act also requires each of the state's distribution electric cooperatives to adopt net metering policies and programs that allow leasing of distributed generation equipment. The net metering programs must be reported to the ORS by June 2, 2015. Section 7 of the Act; S.C. Code Section 58-27-2610(H). The Petitioners and their member distribution cooperatives are considering policies for the development of distributed energy resources including photovoltaic generation such as is proposed by SCE&G in its DER program. The Petitioners believe that SCE&G's program can inform their policies and that there may be opportunities for collaboration between them and SCE&G for the development of distributed generation facilities.

7) In light of the above, the Petitioners have standing to intervene in the generic proceeding and represent the interests of their members. Petitioners and their member cooperatives have a direct and material interest in the issues to be addressed and resolved by the

Commission, and their interests cannot be represented adequately by any other party; furthermore, Petitioners' involvement in these proceedings will promote the public interest by furthering the development of consistent distributed generation policies among the state's electricity providers.

WHEREFORE, Petitioners pray that they will be allowed to intervene in this docket and all related proceedings, including, but not limited to, the ability to appear as parties, engage in discovery and participate in all hearings by offering testimony and exhibits, and cross-examining witnesses. Petitioners request the receipt of all notices, documents, exhibits and data submitted by all parties and the Commission's staff.

Respectfully submitted,



John H. Tiencken, Jr.
Paul J. Conway
Tiencken Law Firm, LLC
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Charleston, South Carolina 29492
Telephone: 843.377.8415
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Christopher R. Koon
The Electric Cooperatives
of South Carolina
808 Knox Abbott Drive
Cayce, South Carolina
Telephone: (803) 739.3034
Fax: (803) 796.6064

Date: 4/29/2015

Charles L.A. Terreni
Terreni Law Firm, LLC
1508 Lady Street.
Columbia, South Carolina 29201
Telephone: 803.771 7228
Fax: 803 771-8778